

**STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION**

AMEREN TRANSMISSION COMPANY)	
OF ILLINOIS,)	
)	
Petition for a Certificate of Public)	
Convenience and Necessity, pursuant to)	
Section 8-406.1 of the Illinois Public)	
Utilities Act, and an Order pursuant to)	
Section 8-503 of the Public Utilities Act,)	No. 12-0598
to Construct, Operate and Maintain a New)	
High Voltage Electric Service Line and)	
Related Facilities in the Counties of Adams,)	
Brown, Cass, Champaign, Christian, Clark,)	
Coles, Edgar, Fulton, Macon, Montgomery,)	
Morgan, Moultrie, Pike, Sangamon,)	
Schuyler, Scott and Shelby, Illinois.)	

**PETITION TO SUPPLEMENT
DUE PROCESS MOTION TO STRIKE PROCEEDINGS
AS TO THE EDGAR COUNTY SEGMENT AND
APPLICATION FOR REHEARING**

COMES NOW Petitioners, Christopher Patrick, Jack Hoffman, Jill Denise Hoffman, Gary Tresner, Thomas Ogle, Vern See, Phil Wright, Mary Liz Wright, Ronald Martin, Stephen Eitel, James Fluckey, Julie Soliday Fluckey, Priscilla Rhoads, Kyle Mooneyham, James Scott Williamson, Rhonda Lynn Williamson, Brent Becker, Beth Morley, Daniel Smittkamp, and Lisa Smittkamp (hereinafter, the "Edgar County Citizens Are Entitled To Due Process"), by their attorney, S. Craig Smith, and in support of their Petition To Supplement Due Process Motion To Strike Proceedings As To The Edgar County Segment and Application for Rehearing in the above-captioned cause, state as follows:

1. Petitioners are landowners directly affected by the Order of the Commission entered herein on August 20, 2013, and which portion places the route directly upon Petitioners' property.
2. Petitioners previously filed their Due Process Motion To Strike Proceedings As To The Edgar County Segment and Application for Rehearing on September 19, 2013.
3. In compliance with Section 200.200(a) of the Commission's Rules of Practice, Petitioners agree to accept service by electronic means as provided in Section 200.1050 of the

Rules of Practice.

4. Service to Petitioners shall be made to:

S. Craig Smith
Asher & Smith
1119 N. Main Street
P. O. Box 340
Paris, IL 61944
Telephone: 217/465-6444
Fax: 217/463-2486
e-mail: craig@ashersmithlaw.com

5. Petitioners agree to accept the record as it exists at the time of this intervention.

6. Attached to this Petition are the following Affidavits, which Petitioners request be supplemented to their previously filed Due Process Motion To Strike Proceedings As To The Edgar County Segment and Application for Rehearing:

- A. JAMES SCOTT WILLIAMSON and RHONDA LYNN WILLIAMSON, marked as Exhibit A
- B. VERN SEE, marked as Exhibit B
- C. MARY ELIZABETH (BETH) MORLEY, marked as Exhibit C
- D. BRENT BECKER, marked as Exhibit D
- E. JAMES FLUCKEY and JULIE SOLIDAY FLUCKEY, marked as Exhibit E
- F. DANIEL SMITTKAMP and LISA SMITTKAMP, marked as Exhibit F
- G. STEPHEN EITEL, marked as Exhibit G
- H. GARY TESNER, marked as Exhibit H
- I. THOMAS OGLE, marked as Exhibit I
- J. RONALD MARTIN, marked as Exhibit J
- K. PRISCILLA RHOADS, marked as Exhibit K
- L. KYLE MOONEYHAM, marked as Exhibit L
- M. JACK HOFFMAN and JILL DENISE HOFFMAN, marked as Exhibit M.

WHEREFORE, Petitioners respectfully request leave to supplement their Due Process Motion To Strike Proceedings As To The Edgar County Segment and Application For Rehearing by attaching Affidavits A through M to their previously filed pleading.

DATED this 30th day of September, 2013.

Respectfully submitted,

“Edgar County Citizens Are Entitled To Due Process”

By Asher & Smith, their Attorneys



S. Craig Smith (#18791)

Asher & Smith

1119 N. Main Street

P. O. Box 340

Paris, IL 61944

Telephone: 217/465-6444

Fax: 217/463-2486

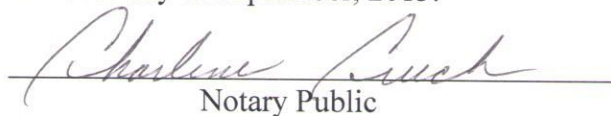
e-mail: craig@ashersmithlaw.com

VERIFICATION

Under penalties as provided under 735 ILCS 5/1-109 the undersigned certifies that the statements set forth in this instrument are true and correct, except as to matters therein stated to be on information and belief and as to such matters the undersigned certifies as aforesaid that the verily believes the same to be true.




SUBSCRIBED AND SWORN TO before me
this 30th day of September, 2013.


Notary Public

CERTIFICATE OF SERVICE

The undersigned, an attorney licensed to practice in the State of Illinois, hereby certifies that a copy of the foregoing instrument was filed and electronically served on the individuals identified in the Illinois Commerce Commission's official services list for Docket No. 12-0598 on the 30th day of September, 2013.


S. Craig Smith, of Asher & Smith, Attorneys for
"Edgar County Citizens Are Entitled To Due
Process"

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AFFIDAVIT

STATE OF ILLINOIS)	
)	SS.
COUNTY OF EDGAR)	

JAMES SCOTT WILLIAMSON and RHONDA LYNN WILLIAMSON, after first being duly sworn on oath, depose and state:

1. We are the legal owner of farmland and residential property in Edgar County, Illinois.
2. Our home address is 525 Prairie Street, Paris, IL 61944.
3. The Edgar County real estate tax bills for the farmland are mailed to our home address, and have been since before this proceeding began.
4. On September 10, 2013, we received a letter dated September 6, 2013, from Ameren, a copy of which is attached hereto as Exhibit A.
5. This letter from Ameren was the first notice we ever received of the proposed transmission line project and of this proceeding, ICC Docket No. 12-0598.

Exhibit A


6. Because we were not given any notice of this proceeding, we have not had any opportunity to participate in this case, nor to propose an alternate route, nor to submit testimony, nor to attend any hearing.

7. The Order filed in this case on August 20, 2013, recommends the approval of the Edgar County segment route, including that part of the route which crosses directly over Petitioners' property, and directly and adversely affects Petitioners' interests.


JAMES SCOTT WILLIAMSON


RHONDA LYNN WILLIAMSON

SUBSCRIBED AND SWORN TO before
me this 27th day of September, 2013.


Notary Public





Ameren Services

September 6, 2013

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Rhonda L. Williamson
16683 Hill Road
Paris, Illinois 61944

RE: ILLINOIS RIVERS PROJECT
Tax ID No(s): 14-19-32-200-002

Dear Property Owner:

Ameren Transmission Company of Illinois ("ATXI") has received authorization from the Illinois Commerce Commission to construct a new 345,000 volt electric transmission line through portions of Illinois. The Commission issued a Certificate of Public Convenience and Necessity in Docket No. 12-0598 on August 20, 2013 which approves selected segments of the route for the line. The Certificate and the Order authorizing ATXI to construct selected segments of the transmission line were granted under Sections 8-406.1 and 8-503 of the Public Utilities Act. This transmission line, which is known as the Illinois Rivers Project, will affect property you own.

The Illinois Rivers Project is part of a group of Multi Value Projects that were approved by the regional electric transmission organization known as the Midcontinent Independent System Operator (MISO) of which ATXI is a member. Multi Value Projects have been identified as providing a number of material benefits to the regional and Illinois electric transmission system. Specifically, the Illinois Rivers Project will facilitate the delivery of renewable energy from wind generation in Illinois and throughout the Midwest. This project will also strengthen the transmission system and improve electric service reliability to homes and businesses in the central Illinois region. Another major benefit of the project will be relief from load congestion, making the system more efficient and thereby reducing costs.

The transmission line will be constructed using single-shaft steel poles and will be built to meet all regulatory and safety requirements. The poles will be placed on concrete foundations, and their height will range from 80 to 140 feet with the typical distance between the poles being approximately 700 feet.

ATXI seeks to negotiate the purchase of an easement or other land rights for the new transmission line across land that you own in Edgar County, Illinois. A Contract Land Staff representative, working as a contractor on ATXI's behalf, will contact you sometime after September 21, 2013 to schedule a meeting to discuss the project in detail and to negotiate a fair and reasonable agreement with you for the easement rights ATXI is seeking. If you would like to contact Contract Land Staff sooner to arrange a mutually agreeable time for an appointment, please call Amanda Sloan at (877) 686-6205 or write to them at 3200 Pleasant Run, Suite C, Springfield, IL 62711.

Enclosed is a "Statement of Information from the Illinois Commerce Commission Concerning Acquisition of Rights of Way by Illinois Utilities" and a project overview map for your information. For more information about the Illinois Rivers project, or for a list of contractors that might be contacting you regarding the easement on your property, please see the Project Website at www.ilriverstransmission.com.

We look forward to meeting with you to discuss the project in detail.

Sincerely,

Rick Trelz, Managing Supervisor, Real Estate
Ameren Transmission Company of Illinois

Enclosures: Illinois Rivers Project map
Statement of Information from the Illinois Commerce Commission
ATXI 9001

1901 Chouteau Avenue
PO Box 66149

St. Louis, MO 63166-6149

Ameren.com

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Schuyler, Scott and Shelby, Illinois.)

AFFIDAVIT

STATE OF ILLINOIS)
) SS.
COUNTY OF EDGAR)

VERN SEE, after first being duly sworn on oath, deposes and states:

1. VERN SEE and KAREN SEE are the legal owners of farmland and residential property in Edgar County, Illinois.
2. Our home address is 5293 Public Well Street, Paris, IL 61944.
3. The Edgar County real estate tax bills for the farmland are mailed to our home address, and have been since before this proceeding began.
4. On September 10, 2013, KAREN SEE received a letter dated September 6, 2013, from Ameren, a copy of which is attached hereto as Exhibit A.
5. This letter from Ameren was the first notice we ever received of the proposed transmission line project and of this proceeding, ICC Docket No. 12-0598.
6. Because we were not given any notice of this proceeding, we have not had any

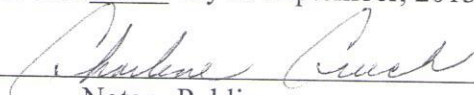
Exhibit B

opportunity to participate in this case, nor to propose an alternate route, nor to submit testimony, nor to attend any hearing.

7. The Order filed in this case on August 20, 2013, recommends the approval of the Edgar County segment route, including that part of the route which crosses directly over Petitioner's property, and directly and adversely affects Petitioners' interests.


VERN SEE

SUBSCRIBED AND SWORN TO before
me this 25th day of September, 2013.


Notary Public

